

DORSEY, KING, GRAY, NORMENT & HOPGOOD

ATTORNEYS-AT-LAW

318 SECOND STREET

HENDERSON, KENTUCKY 42420

JOHN DORSEY (1920-1986)  
FRANK N KING, JR  
STEPHEN D GRAY  
WILLIAM B NORMENT, JR  
J CHRISTOPHER HOPGOOD  
S MADISON GRAY

TELEPHONE  
(270) 826-3965  
TELEFAX  
(270) 826-6672  
www.dkgnlaw.com

November 11, 2008

RECEIVED

NOV 12 2008

PUBLIC SERVICE  
COMMISSION

FEDEX

Ms. Stephanie Stumbo  
Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602

Re: UNWIND  
Jackson Purchase Energy Corporation  
PSC Case No. 2008-00010

Dear Ms. Stumbo:

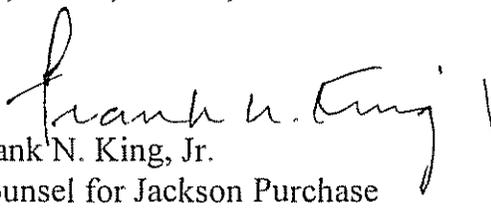
Enclosed for filing please find the original and 10 copies of Motion to File Amended Application with attachments. We tender herewith the original of the proposed Amended Application for filing in the record when the motion is granted.

Your assistance in this matter is appreciated.

Very truly yours,

DORSEY, KING, GRAY, NORMENT & HOPGOOD

By

  
Frank N. King, Jr.  
Counsel for Jackson Purchase  
Energy Corporation

FNKJr/cds

Encls.

COPY/w/encls.: Service List  
Mr. G. Kelly Nuckols  
Ms. Melissa Yates  
Mr. Jack Gaines

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

RECEIVED

In the Matter of: )  
)  
The Application of Jackson Purchase )  
Energy Corporation for Approval of )  
Retail Tariff Riders, Revised Tariffs )  
and New Tariff and for Approval of )  
Amendment of Wholesale Agreement )

CASE NO. 2008-00010

NOV 12 2008  
PUBLIC SERVICE  
COMMISSION

MOTION TO FILE AMENDED APPLICATION

JACKSON PURCHASE ENERGY CORPORATION ("JPEC"), by counsel, moves that it be permitted to file Amended Application herein. In support of this motion JPEC states that the original Application needs to be amended to address matters that have occurred since the original filing herein and to confirm that the six (6) tariff riders originally proposed in this proceeding are still applicable and do not need modification. A copy of the proposed Amended Application is attached hereto.

WHEREFORE, JPEC moves that it be permitted to file Amended Application and that it be afforded all proper relief.

DORSEY, KING, GRAY, NORMENT & HOPGOOD  
318 Second Street  
Henderson, Kentucky 42420  
(270) 826-3965 Telephone  
(270) 826-6672 Telefax  
Attorneys for Jackson Purchase Energy Corporation

By Frank N. King, Jr.  
FRANK N. KING, JR.

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Amendment of Wholesale Agreement )

AMENDED APPLICATION

The Amended Application of JACKSON PURCHASE ENERGY CORPORATION (“JPEC”) respectfully shows:

Introduction

The purpose of this Amended Application is two-fold:

(1) To change from approximately five (5) years to one year the length of time that the Unwind Rider—Composite Factor (URCF) will be used to confirm that the net effect of the other five (5) riders is zero. The reason for this change is that JPEC and the other two (2) member cooperatives of Big Rivers Electric Corporation have agreed with Big Rivers’ proposal to modify the manner in which the Economic Reserve will be used which will allow retail rates to gradually increase after the first year following the closing of the Unwind in order to avoid a severe increase in rates later.

(2) To file the Supplemental Direct Testimony of Jack D. Gaines. This supplemental testimony confirms that the six (6) tariff riders originally proposed in this

proceeding are still applicable and do not need modification, and addresses matters that have occurred since the original filing herein.

\* \* \* \* \*

JPEC hereby amends its Application in the following respects:

1. The statement in the Application that the sixth retail tariff rider will be used to confirm that the net effect of the five (5) corresponding riders is zero for a projected period of time expected to be approximately five (5) years is changed to state that the projected period of time is expected to be one year. This statement appears in the Application in the last paragraph on the first page and in paragraph (d) on page 2.

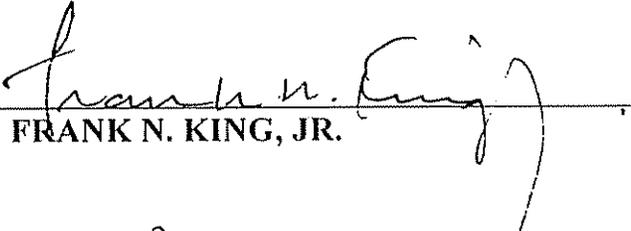
2. Attached as Exhibit 13 is the Supplemental Direct Testimony of Jack D. Gaines confirming that the six (6) tariff riders proposed in this proceeding are still applicable and do not need modification, and addressing matters that have occurred since the original filing herein.

3. In all other respects JPEC adopts and reaffirms its Application filed herein.

**WHEREFORE**, JPEC requests as set forth in its original Application.

**DORSEY, KING, GRAY, NORMENT & HOPGOOD**  
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Henderson, Kentucky 42420  
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Attorneys for Jackson Purchase Energy Corporation

By

  
FRANK N. KING, JR.



1 OR FOR ANY REASON?

2 A. No changes to any of JPE's proposed tariff riders are needed.

3 7 Q. ARE THERE ANY CHANGES YOU WANT TO MAKE TO YOUR  
4 FILED TESTIMONY BASED ON MORE CURRENT INFORMATION?

5 A. Yes, there are two changes. First, at pages 2 and 3 of my filed testimony, I  
6 stated that "the Cost Reduction Adjustment ("CRA") will continue in  
7 effect unchanged." That is no longer true. Big Rivers discontinued its  
8 Member Discount Adjustment Rider effective September 1, 2008.  
9 Therefore, the JPE CRA has also been discontinued. Second, at page 7,  
10 lines 5 through 8, I stated that "BREC and the BREC Members have  
11 carefully structured the five wholesale riders and corresponding retail  
12 riders to have zero effect on customers' bills so long as sufficient funds are  
13 available from the BREC Economic Reserve currently estimated to be five  
14 years."

15 Based on Big Rivers' most recent financial model filed October 9, 2008 in  
16 PSC Case No. 2007-00455 and PSC Case No. 2007-00460, the Economic  
17 Reserve is no longer expected to be sufficient to fully offset the five  
18 wholesale riders to allow a zero effect on customers' bills for five years  
19 This is in part due to the economics reflected in Big Rivers' most recent  
20 financial model which have shortened the period from five years to  
21 between three and four years. It is also a result of the revision proposed by  
22 Big Rivers to Schedule MRSM which is designed to allow gradual  
23 increases in the net wholesale bills to the BREC Members to extend the

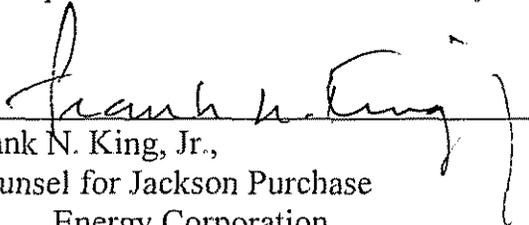
1                   life of the Economic Reserve and to avoid there being a severe rate  
2                   increase upon its expiration. At this time, the zero effect on customer bills  
3                   is expected to last only one year.

4   8.    Q.    DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT  
5            TESTIMONY AT THIS TIME?

6    A.    Yes, it does.

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on the persons named in the attached service list by mailing true and correct copies of same this the 11<sup>th</sup> day of November, 2008.

  
\_\_\_\_\_  
Frank N. King, Jr.,  
Counsel for Jackson Purchase  
Energy Corporation

**Case No 2008-00010**  
**SERVICE LIST**

Hon. James M. Miller  
Hon. Tyson Kamuf  
Sullivan, Mountjoy, Stainback & Miller  
Post Office Box 727  
Owensboro, KY 42302  
Attorneys for Big Rivers Electric  
Corporation

Hon. Doug Beresford  
Hon. Geof Hobday  
Hogan & Hartson  
555 Thirteenth Street, NW  
Washington, DC 20004  
Attorneys for Big Rivers Electric  
Corporation

Hon. Kendrick Riggs  
Stoll, Keenon Ogden PLLC  
500 West Jefferson Street  
Louisville, KY 40202  
Attorney for E.ON U.S., LLC,  
West Kentucky Energy Corp. and  
LG&E Energy Marketing, Inc.

Hon. Allyson Sturgen  
220 West Main Street  
Louisville, KY 40202  
Attorney for E.ON U.S., LLC

Hon. Michael L. Kurtz  
Boehm, Kurtz & Lowry  
36 East Seventh Street – Suite 2110  
Cincinnati, OH 45202  
Attorney for Kentucky Industrial Utility  
Customers

Hon. David Brown  
Stites & Harbison, PLLC  
1800 Aegon Center  
400 West Market Street  
Louisville, KY 40202  
Attorney for Alcan Primary Products  
Corporation and Century Aluminum of  
Kentucky General Partnership

Hon. John N. Hughes  
124 West Todd Street  
Frankfort, KY 40601  
Attorney for Henderson Municipal  
Power & Light

Hon. Dennis Howard  
Assistant Attorney General  
Office of the Attorney General  
Utility & Rate Intervention Division  
1024 Capital Center Drive-Suite 200  
Frankfort, KY 40601-8204

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\* \* \* \* \*

JPEC hereby amends its Application in the following respects:

1. The statement in the Application that the sixth retail tariff rider will be used to confirm that the net effect of the five (5) corresponding riders is zero for a projected period of time expected to be approximately five (5) years is changed to state that the projected period of time is expected to be one year. This statement appears in the Application in the last paragraph on the first page and in paragraph (d) on page 2.

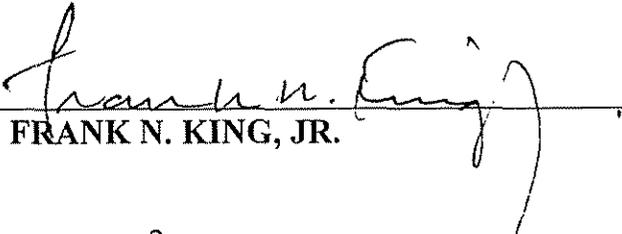
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